

Donald D. duBoulay
Attorney at Law

305 Broadway, Suite 310
New York, NY 10007

Telephone: (212) 966-3970
Fax: (212) 941-7108
E-mail: dondubesq@aol.com

March 15, 2021

The Honorable Katherine P. Failla
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Centre Street
New York, NY 10007

MEMO ENDORSED

Re: United States of America v. William Valdez
20 Cr. 226 (KPF)

Dear Judge Failla:

I write to respectfully request a postponement of the sentencing hearing in this case currently scheduled for March 31, 2021. To date I have not had sufficient opportunity to meaningfully review the final Presentence with Mr. Valdez, who has exhibited great difficulty understanding certain concepts contained therein. The additional time will allow me to spend more time reviewing the report with Mr. Valdez. As a consequence of the ongoing pandemic and the safety concerns that exist, I have limited my in-person discussions with Mr. Valdez to no more than one- hour sessions with him. That has proven to be an insufficient amount of time to meaningfully review this document with him.

Further we have had difficulty locating individuals from whom we expect to furnish letters in support of Mr. Valdez. This it is respectfully requested that the Court set a sentence date 45 days from the currently scheduled sentencing date.

The Government consents to this request.

Respectfully Submitted,

_____/s/_____
Donald duBoulay, Esq
Counsel for William Valdez

cc: Andrew Chen, AUSA (via ECF)

Application GRANTED. Mr. Valdez's sentencing is ADJOURNED to **May 27, 2021, at 10:00 a.m.** The defense sentencing submission shall be filed on or before **May 13, 2021**, and the Government's submission shall be filed on or before **May 20, 2021**.

Dated: March 15, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE